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And Linda Johnson Rice

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

IN RE TESLA, INC. SECURITIES
LITIGATION

Case No. 3:18-cv-04865-EMC

**DECLARATION OF MICHAEL T. LIFRAK
IN SUPPORT OF DEFENDANTS'
MEMORANDUM IN SUPPORT OF
DEFENDANT'S MOTION TO TRANSFER
VENUE**

DECLARATION OF MICHAEL T. LIFRAK

I, Michael T Lifrak, declare as follows:

1. I am a partner at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Defendants in this action. I make this declaration in support of Defendants' Memorandum In Support of Defendants' Motion to Transfer Venue. I know the facts stated herein of my own personal knowledge, and if called as a witness, I could and would testify competently thereto.
2. Attached hereto as **Exhibit A** is a true and correct copy of the potential juror questionnaires provided to the Parties on January 10, 2023, which has been lodged under seal pursuant to Defendants' accompanying administrative motion to seal.

I declare under penalty of perjury of the laws of the State of California that the foregoing is true and correct.

Executed this 12th day of January, 2023 in Los Angeles, California.

By: /s/ Michael T. Lifrak
Michael T Lifrak

EXHIBIT A

TO BE FILED UNDER SEAL